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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA
Las Vegas Division**

Center for Biological Diversity, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civ. No. 2:13-cv-1785-RFB-GWF
)	
Tom Vilsack, <i>et al.</i> ,)	
)	
Defendants.)	

**JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION
OF SUMMARY JUDGMENT BRIEFING DEADLINES**
(Third Request)

The parties – Plaintiffs Center for Biological Diversity, Maricopa Audubon Society, and Dr. Robin Silver and Defendants Tom Vilsack, Gregory Parham, Sally Jewell, and Dan Ashe, in their official capacities – hereby jointly submit this stipulation stating as follows:

1. On December 8, 2014, this Court approved a Joint Stipulation of the parties extending summary judgment briefing deadlines by one week. *See* ECF No. 24. On March 2, 2015, this Court approved a second Joint Stipulation of the parties extending the remaining summary judgment briefing deadlines by two weeks. *See* ECF No. 33. Pursuant to the latter stipulation, Plaintiffs' combined opposition to Defendants' cross-motion for summary judgment and reply in support of Plaintiffs' motion for summary judgment is presently due April 8, 2015. *See id.* In their stipulation, the parties agreed that "in the event that further changed circumstances or good cause necessitates further revision to this schedule, the parties will confer and jointly propose a further revised schedule for the Court's review and approval." *Id.* ¶ 4. Defendants filed their combined cross-motion for summary judgment and opposition to Plaintiffs' motion for summary judgment on February 27, 2015. *See* ECF No. 30.

2. On March 24, 2015, Plaintiffs' lead counsel conferred with Defendants' counsel to request an extension for filing Plaintiffs' combined opposition/reply brief, based on Plaintiffs' counsel's other professional obligations, including unanticipated intervening briefs in other cases with non-extendable deadlines, as well as an intervening mandatory court appearance requiring out-of-office travel. Upon review of their calendars, counsel for all parties agreed to extend the filing deadline for Plaintiffs' combined opposition/reply brief to April 29, 2015 (thus extending Defendants' reply brief deadline to June 4, 2015). Hence, Defendants have consented to the following proposed schedule, and the parties agree that good cause has been shown here based on changed circumstances.

3. Accordingly, counsel for all parties stipulate that good cause exists for an extension in this matter, and respectfully request that the Court approve the following proposed briefing schedule, which includes an extension for all remaining deadlines:

ACTION REQUIRED	DATE
Plaintiffs shall file their combined opposition and reply to Defendants' cross-motion (30 pages)	April 29, 2015
Defendants shall file their reply (20 pages)	June 4, 2015

4. The parties agree that, in the event that further changed circumstances or good cause necessitates further revision to this schedule, the parties will confer and jointly propose a further revised schedule for the Court's review and approval.

Respectfully submitted,

/s/
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Attorneys for Defendants

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: this 26th day of March, 2015.